

Cowlitz County PUD comments on potential Changes to BPA Generation Imbalance Charges

It is the District's understanding that PPC (the Public Power Council) will be submitting comments related to BPA's proposed Generation and Energy Imbalance charges, and we support and echo the comments submitted by the PPC. In addition, we would like to submit the following comments.

In a draft strawman proposal dated September 12, 2002, BPA proposed to "Eliminate monthly carryover for within the band deviations to make billing corrections easier".

We encourage BPA to retain the monthly carryover of within the band deviations. Eliminating the carryover provision would require utilities to be at exactly zero balance on the deviation account at the 2400 hour on the last day of the month. For utilities that schedule resources that are somewhat unpredictable or hard to accurately forecast, it would be very difficult if not impossible to exactly be at zero on the last hour of the month, particularly if that last hour falls on a weekend where preschedules may be submitted three or four days in advance. Additionally, not all resources generate for a full month. For those resources, if they generate during the first part of a month and shut down before the end of the month it should continue to be possible, through the carryover provision, to return the imbalance the following month. We do not believe it is a significant administrative burden for the billing staff, as they would have to calculate the amount of within the band deviations for the month regardless of whether the carryover provision is retained or not. Carrying over a single number for Heavy Load Hours and a single number for Light Load Hours seems relatively simple.